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Attorneys for Plaintiff
GARDEN CITY BOXING CLUB, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GARDEN CITY BOXING CLUB, INC.,

Plaintiff,

vs.

MIGUEL JUAREZ ZAVALA, et al.

Defendants.

CASE NO. C 07-05925 MMC

PLAINTIFF'S APPLICATION
FOR AN ORDER EXTENDING
TIME TO COMPLETE SERVICE;
AND CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE;
AND ORDER (Proposed)

TO THE HONORABLE MAXINE M. CHESNEY, MIGUEL JUAREZ
ZAVALA, AND ZAVALA CORP. DEFENDANTS, AND THEIR ATTORNEY/S
OF RECORD:

1. On November 26, 2007, Plaintiff's Complaint was filed against Defendant Miguel Juarez Zavala, (hereinafter referred to as "Defendant").

2. On November 26, 2007, Plaintiff's Complaint was filed against Defendant Zavala Corp., (hereinafter referred to as "Defendant").

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3. As of this writing, Plaintiff has not yet served the initiating suit papers on defendants Miguel Juarez Zavala or Zavala Corp.

4. Plaintiff recently identified an address it believes will be valid and effective to perfect service of process against defendant Miguel Juarez Zavala. Defendant Zavala Corp. is no longer in good standing. As such, defendant Zavala Corp. has been dismissed from this action.

WHEREFORE, Plaintiff respectfully requests that the Court permit an additional thirty (30) days from today's date to effectuate service of the Summons and Complaint filed in this matter, or to file a motion for service by publication, or in the alternative, a Notice of Voluntary Dismissal as to Defendant Miguel Juarez Zavala.

Plaintiff additionally and respectfully requests this Honorable Court continue the Case Management Confernece, presently set for Friday, March 7, 2008 to a date approximately thirty (30) days forward.

Respectfully submitted,

Date: February 18, 2008

/s/ *Thomas P. Riley*

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley, Esquire

Attorneys for Plaintiff

Garden City Boxing Club, Inc.

ORDER (Proposed)

The Court, upon review of Plaintiff's request and representations presented in the above-entitled matter hereby orders the following:

Plaintiff is granted an additional thirty (30) days from today's date to effectuate service of the Summons and Complaint filed in this matter, or to file a motion for service by publication, or in the alternative, a Notice of Voluntary Dismissal as Defendant Miguel Juarez Zavala where service has not been made or service by publication requested.

It is further ordered that the Case Management Conference presently set for Friday, March 7, 2008 is hereby continued to _____.

Plaintiff shall serve a copy of this Order on Defendant Miguel Juarez Zavala, and file a Certificate of Service of Order promptly thereafter.

IT IS SO ORDERED:

HONORABLE MAXINE M. CHESNEY
United States District Court Judge
Northern District of California

Date: _____

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**PLAINTIFF'S APPLICATION FOR AN ORDER EXTENDING
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PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, CA 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On February 18, 2008, I served:

**PLAINTIFF'S APPLICATION FOR AN ORDER EXTENDING TIME
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MANAGEMENT CONFERENCE; AND ORDER (Proposed)**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Miguel Juarez Zavala (Defendant)
200 San Joaquin Avenue
Antioch, CA 94509

Zavala Corp. (Defendant)
(c/o Miguel Juarez Zavala)
200 San Joaquin Avenue
Antioch, CA 94509

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on February 18, 2008, at South Pasadena, California.

Dated: February 18, 2008

/s/ Raquel Hernandez

RAQUEL HERNANDEZ

**PLAINTIFF'S APPLICATION FOR AN ORDER EXTENDING
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